

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Robert Dedmon,	§	CIVIL ACTION NO.
Plaintiff,	§	4:21-cv-03371
	§	
	§	JUDGE CHARLES ESKRIDGE
vs.	§	
	§	Jury Demand
Shell Exploration &	§	
Production Company and	§	
Shell Trading Services	§	
Company,	§	
Defendants.	§	

PLAINTIFF ROBERT DEDMON'S FIRST AMENDED WITNESS LIST

Robert Dedmon may call any witness listed in Defendants' witness list. This amended witness list does not add any new witnesses other than two witnesses listed on Defendants' Witness List [ECF Doc. 63].

compensatory damages: before and after witnesses		
NO.	WITNESS NAME	WITNESS ADDRESS
	Keyani Adigun	2448 Baldwin Crescent NE Washington, D.C. 20018
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian sister topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	Brandon Crutchfield	8700 Stacy Road #5119 McKinney, Texas 75070
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend since high school topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	Brushaud Callis	12110 Upton Park San Antonio, Texas 78253
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend since college topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	

NO.	WITNESS NAME	WITNESS ADDRESS
	Brooke Dedmon	1 Acosta Valley Drive Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian wife topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	Karen Dedmon	5303 Amber Sky Lane Rosharon, Texas 77583
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian mother topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	Robert Dedmon, Jr.	5303 Amber Sky Lane Rosharon, Texas 77583
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian father topics: one of the witnesses who will collectively address the non-wage harm to his son, including comparison of his son before and after learning of the discrimination	

NO.	WITNESS NAME	WITNESS ADDRESS
	Robert Dedmon IV	1 Acosta Valley Drive Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian plaintiff <u>topics</u> : one of the witnesses who will collectively address the non-wage harm to him, including comparison of how he was before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	James Ledbetter	6307 Flewellen Falls Lane Fulshear, Texas 77441
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend, former Shell employee <u>topics</u> : one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	Shara McKinnon (Brown)	20462 Avelignese Way Tomball, Texas 77377
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian family friend <u>topics</u> : one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	

NO.	WITNESS NAME	WITNESS ADDRESS
	Jamal Porter	19808 Eire Drive Pflugerville, Texas 78660 Simon Property Group 2901 South Capital of Texas Highway Austin, Texas 78746
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend since college topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
	Brandon Saunders	Bell's Life Enhancement 6302 Highway 6, Suite K Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
	Jasmine Turner	Alchemy Counseling and Wellness, PLLC 1011 Augusta Drive, Ste #107 Houston, Texas 77057
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian treating counselor topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon; treatment; teaching jury about anxiety, panic attacks, cumulative trauma; explanation of the subjects identified in expert disclosures for her	

other trial witnesses: liability, economic damages, punitive damages		
NO.	WITNESS NAME	WITNESS ADDRESS
	Gentill Abdulla	9613 Bayou Brook Street Houston, Texas 77063
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell power trading analyst who reported to Luis Lugo and worked with inside sales team including Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; his experience and observations related to his work and position; comparative skill of those he worked with on the inside sales team; observed differential treatment of workers based on protected characteristics	
NO.	WITNESS NAME	WITNESS ADDRESS
	Gaurdie E. Banister	2415 San Felipe Street #9 Houston, Texas 77019-2509
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee; director with several organizations, such as Enbridge, Dow, Tyson Foods, and Russell Reynolds Associates; CEO of Different Points of View; Chairman of Tyson Foods, Inc.'s Compensation and Leadership Development Committee topics: basic background; history of race discrimination at Shell based on observation and experience; his quote in the Original Petition and Jury Demand filed in this case; equitable compensation systems; preventing and stopping unlawful pay disparities	

No.	WITNESS NAME	WITNESS ADDRESS
	Jim Barker	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; existence and location of missing documents	
No.	WITNESS NAME	WITNESS ADDRESS
	Lisa Billington	3000 Bissonnet Street, Apt. 7110 Houston, Texas 77005
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former human resources professional for Shell topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; pre-employment process from offer to first day of payroll; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Beth Bowman	Targa 811 Louisiana, Suite 2100 Houston, Texas 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Senior Vice President for Shell and direct supervisor for Sri Rangan topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; her own pay and job grades; her experience and observations related to her work and position; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; observed differential treatment of workers based on protected characteristics; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Robert Dedmon	1 Acosta Valley Drive Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian plaintiff topics: all topics concerning liability and damages	

NO.	WITNESS NAME	WITNESS ADDRESS
	Michael Deley	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; the events surrounding the need to fill a vacant position on the team in 2021; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Megan Foltz (Rozelle)	409 W. 24th Street Houston, Texas 77008
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell human resources account manager topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Patrick Frnka	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; the events surrounding the need to fill a vacant position on the team in 2021; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Jennifer Hartnett	address unknown c/o Marlene Williams Ogletree, Deakins, Nash, Smoak & Stewart, P.C. 500 Dallas Street, Suite 2100 Houston, Texas 77002 (713) 655-0855
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell manager topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; her own pay and job grades; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; differential treatment of workers based on protected characteristics; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Tim Hood	Mercuria Energy America 20 Greenway Plaza #650 Houston, Texas 77046
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell manager over power trading topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; performance metrics and revenue or profit tracking; his own pay and job grades; his experience and observations related to his work and position; his observations concerning unequal pay	
NO.	WITNESS NAME	WITNESS ADDRESS
	Doug Hund	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; power versus gas sales; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; the events surrounding the need to fill a vacant position on the team in 2021; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Sarah Hutnek	1217 W. 16 th Street Houston, Texas 77008
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell human resources consultant topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about response to EEOC charge of discrimination; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Ryan Kolkmann	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; the events surrounding his exit and so the need to fill a vacant position on the team in 2021; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	James Ledbetter	6307 Flewellen Falls Lane Fulshear, Texas 77441
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; his own pay and job grades; his experience and observations related to his work and position; the internal resolution process; observed differential treatment of workers based on protected characteristics; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Meredith Lilly	Mercuria Energy America 20 Greenway Plaza #650 Houston, Texas 77046
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; her own pay and job grades; her experience and observations related to her work and position on the inside sales team; her offer of employment at JG5 for the same job duties roles later offered to Mr. Dedmon; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Grace Loh	150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee applicant for the open 2021 raise that was given to Michael Deley topics: basic background, the process surrounding her application and overall process concerning same	
NO.	WITNESS NAME	WITNESS ADDRESS
	Luis Lugo	13802 Majestic Spring Lane Humble, Texas 77396
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell manager over energy trading; current Vice President and Head of ERCOT Trading for Mercuria Energy America topics: topics addressed in his declaration; basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; performance metrics and revenue or profit tracking; his own pay and job grades; his experience and observations related to his work and position; observed differential treatment of workers based on protected characteristics; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Logan Luzzi	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and	

	observations related to his work and position on the inside sales team; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Sean Matthews	30232 Post Oak Run Magnolia, Texas 77355
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell energy trader; current head of Midwest Sales at Mercuria topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; performance metrics and revenue or profit tracking; his own pay and job grades; his experience and observations related to his work and position; observed differential treatment of workers based on protected characteristics; his reports about pay disparities to Glenn Wright; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Laura Moses	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee relations advisor topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about response to EEOC charge of discrimination; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Priscilla Partida	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee and later manager on the inside sales team where Mr. Dedmon worked topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; her own pay and job grades; her experience and observations related to her work and position on the inside sales team; observed and experienced differential treatment of workers based on protected characteristics; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Teri Ramsey (Cornelius-Olmen)	3003 Eagle Ridge Way Houston, Texas 77084
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell human resources manager for Shell topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Srikala (Sri) Rangan	30 Dortha Lane Sugar Land, Texas 77479
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell hiring manager and later Vice President topics: topics addressed in her declaration; basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; organizational, pay, account, and account assignment structures and operations; performance metrics and revenue, profit, and gross margin tracking; her own pay and job grades; her experience and observations related to her work and position; observed differential treatment of workers based on protected characteristics; involvement and knowledge about 2014 and 2015 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for and then moved to; direct evidence of race discrimination in this case; her EEO report to Shell; her knowledge, observation, and experience concerning all of the above; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Chris Riley	204 Vincent Street Houston, Texas 77009
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on Defendants' witness list topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; organizational, pay, account, and account assignment structures and operations; performance metrics and revenue, profit, and gross margin tracking; her own pay and job grades; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Raif Rucker	204 Vincent Street Houston, Texas 77009
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; observed and experienced differential treatment of workers based on protected characteristics; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Robyn L. Sutton	Shell 1000 Main Street Houston, Texas 77010
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell Trading & Supply human resources manager topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Michael Tickle	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell manager for the inside sales team where Mr. Dedmon worked topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; the events surrounding the need to fill a vacant position on the team in 2021; potential falsification of performance data; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Ken Ueng	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; existence and location of missing documents	

NO.	WITNESS NAME	WITNESS ADDRESS
	Erin Verdon	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell Trading and Supply Vice President of Human Resources who signed employment offer letter for Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	D'Andra Wallace	Total Energies 1201 Louisiana Street, Suite 1800 Houston, Texas 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee who worked with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; her own pay and job grades; her experience and observations related to her work and position; observed and experienced differential treatment of workers based on protected characteristics; her experience and observations related to her work with Mr. Dedmon	

NO.	WITNESS NAME	WITNESS ADDRESS
	Kendra Williams	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell recruiter topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; existence and location of missing documents	
NO.	WITNESS NAME	WITNESS ADDRESS
	Glenn T. Wright	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Current SVP for Shell topics: Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and revenue or profit tracking; his own pay and job grades; his experience and observations related to his work and position; observed differential treatment of workers based on protected characteristics; reports he received about pay disparities based on race; relationship of different entities as relevant to this case; Sri Rangan's disclosure of discrimination to Mr. Dedmon and his negative reaction to same; existence and location of missing documents	

post-verdict witnesses: attorneys' fees		
NO.	WITNESS NAME	WITNESS ADDRESS
	Amy E. Gibson	Gibson Wiley PLLC 1500 Jackson Street #109 Dallas, Texas 75201-4923
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian Attorney-in-Charge and counsel of record in this civil action for Robert Dedmon. She is expected to testify on attorneys' fees.	
NO.	WITNESS NAME	WITNESS ADDRESS
	Andrew Golub	Dow Golub Remels & Gilbreath, PLLC 2700 Post Oak Boulevard, Suite 1750 Houston, Texas 77056
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian He is expected to testify as an expert on attorneys' fees.	
NO.	WITNESS NAME	WITNESS ADDRESS
	Amanda C. Hernandez	AH Law, PLLC 5718 Westheimer, Suite 1000 Houston, Texas 77057
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian Of counsel and counsel of record in this civil action for Robert Dedmon. She is expected to testify on attorneys' fees.	
NO.	WITNESS NAME	WITNESS ADDRESS
	Brian Sanford	Sanford Firm Attorneys at Law 1910 Pacific Avenue, 15th Floor Dallas, Texas 75201
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian He is expected to testify as an expert on attorneys' fees.	

NO.	WITNESS NAME	WITNESS ADDRESS
	David L. Wiley	Gibson Wiley PLLC 1500 Jackson Street #109 Dallas, Texas 75201-4923
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Of counsel and counsel of record in this civil action for Robert Dedmon. He is expected to testify on attorneys' fees.	

Date: March 6, 2025

Respectfully submitted,

/s/ Amy Gibson

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